

REMARKS/ARGUMENTS

The office action of October 25, 2005 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-8 and 11, 12, 14 and 16-32 remain in this application. Claim 13 has been canceled without prejudice or disclaimer, and claims 9, 10 and 15 were previously canceled without prejudice or disclaimer.

Claims 1-8, 11-14 and 16-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Matthews et al., "Complete Reference FrontPage 2000," Public Release 1999 by Osborn/McGraw-Hill, CA ("Matthews") in view of Eric Ladd et al., "Complete Edition Using HTML 4, XML, and JAVA 1.2," Public Release 12-23-1998, by Que, USA ("Ladd"). Applicants respectfully traverse this rejection.

Claim 1 calls for, among other features, detecting object tag elements within the selected portion; inserting immediately prior to each object tag element within the selected portion a second in-line editing tag corresponding to the desired in-line editing function and inserting the second in-line editing tag at the end of the selected portion; and inserting immediately after each object tag element within the selected portion the first in-line editing tag, wherein the first and second in-line editing tags are distinguishable from the object tag elements irrespective of the in-line editing function to which the first and second in-line editing tags correspond. The action alleges that Matthews shows receiving from a user an indication of a selected portion of a Web-based document to be edited, but does not teach or suggest an indication of a desired in-line editing function to be performed on the selected portion as well as the remaining identified features. To show the features missing from Matthews, the action points to Ladd at Chapter 9, pages 262-280 and Chapters 24 through 26 at pages 582-668.

As for the features enumerated above, contrary to the action's assertion, Ladd lacks a teaching or suggestion of the computer-implemented step of detecting object elements, and the last two computer-implemented steps of claim 1 of inserting in-line editing tags relative to the object tag elements as recited. In Ladd, such as in Listing 26.4 (as realized in Figures 26.5 and 26.6), the style of elements of an HTML document may be dynamically changed; the script changes the format in response to a particular mouse command. While the format of the

document can be changed, there is no suggestion of any process of how the underlying object tags are detected and how in-line editing tags would be inserted as recited in claim 1. As to how this would be performed, there is no support for the last two particular computer implemented steps of inserting called for in claim 1 being in any way be obvious from Ladd. Matthews provides no suggestion for these steps. Perhaps, the action is asserting that these features of claim 1 are somehow inherent to Ladd. To establish inherency however, it must be shown that these features must result and not that they possibly could result. Clearly, the action has failed to make such a showing. As such, the combination of Matthews and Ladd, even if proper, does not result in the claim 1 invention.

It will be further appreciated that the claim 1 invention is designed for implementation in an environments such as where computer users edit a preexisting document and the edits can be shared with other users, where those users may be able to identify the specific edits of an associated user. In such an environment, a particular methodology for detecting object tags and inserting in-line editing tags relative to the object tags is utilized to preserve the edits as well as the original document; the invention of claim 1 provides such a methodology. Neither Matthews nor Ladd even contemplate such a methodology, much less this type of application of the claim 1 invention.

Independent claim 7, which calls for an object tag detecting module and an insertion module, is patentably distinct from Matthews and Ladd for substantially the same reasons set forth above with respect to claim 1.

Claims 2-6, 11, 12, and 27-32, which ultimately depend from one of claims 1 and 7, are allowable over the applied art for the same reasons as their ultimate base claim, and further in view of the additional advantageous features recited therein. For example, claim 5 (see also claim 11, which is similar) recites that when an object tag element closing a first function is found within the selected portion of the Web-based document without a corresponding object tag element opening the first function, the method includes inserting a third editing tag closing the first function immediately prior to the first editing tag immediately before the selected portion; and inserting a fourth editing tag opening the first function immediately after the first editing tag immediately before the selected portion. The combination of Matthews and Ladd is wholly

devoid of any teaching or suggestion as to such a scenario. Moreover, such a scenario is not inherent for similar reasons as described with respect to claims 1 and 7.

Matthews and Ladd also fail to contemplate the features of claims 6 and 12. For example, claim 12 recites that when an object tag element opening a first function is found within the selected portion of the Web-based document without a corresponding object tag element closing the first function, the insertion module inserts an in-line editing tag opening the first function immediately after the in-line editing tag immediately after the selected portion, and inserts an in-line editing tag closing the first function immediately before each object tag element within the selected portion after the object tag element opening the first function and inserts an in-line editing tag reopening the first function immediately after each object tag element within the selected portion after the object tag element opening the first function. Similar to the discussion regarding claim 1 above, both Matthews and Ladd alone or in combination are wholly devoid of any teaching or suggestion inserting in-line editing tags relative to the object tags. Moreover, the claim 12 invention provides a particular methodology for handling a situation when a spurious object tag is discovered, and in particular a spurious “open” object tag. Matthews and Ladd do not address or otherwise contemplate such a scenario.

Claim 3 calls for, among other features, saving a portion of the Web-based document including the first and second in-line editing tags separate from the Web-based document, and reinserting the first and second in-line editing tags into the Web-based document where the first and second in-line editing tags were inserted prior to being saved in response to a reassembly request. The combination of Matthews and Ladd does not teach or suggest the claim 3 features saving a portion of the Web-based document including the first and second in-line editing tags separate from the unedited Web-based document, and reinserting the first and second in-line editing tags into the unedited Web-based document where the first and second in-line editing tags were inserted prior to being saved in response to a reassembly request. In an illustrative implementation of the claim 3 invention, user edits as well as the original document may be preserved and the edited document may be reassembled. No such application is contemplated by either Matthews or Ladd. Similarly, claim 4 is further patentably distinct from the combination of Matthews and Ladd.

Claim 13 has been amended to incorporate the features of previously dependent claim 16 and to further clarify the invention, and now includes for, among other features, storing the in-line editing tags and context portions of the Web-based document associated with the in-line editing tags separate from the unedited Web-based document; and reinserting the in-line editing tags into the unedited Web-based document based on the context portions. Claim 13 is similar to claim 3 in some respects is allowable for the same reasons as claim 3 to the extent the same reasoning articulated with respect to claim 3 applies to claim 16. In addition, claim 13 calls for storing context portions of the Web-based document associated with the in-line editing tags separate from the unedited Web-based document, and reinserting the in-line editing tags based on the context portions. These features are neither taught nor suggested by the combination of Matthews and Ladd.

Claims 14, 15 and 17-26, which ultimately depend from claim 13, are patentably distinct from the cited art for the same reasons as amended claim 13, and further in view of the advantageous features recited therein. For example, the combination of Matthews and Ladd does not teach that the context portions of the Web-based documents include portions of the Web-based document immediately prior to and after where the in-line editing tags were inserted into the Web-based document as recited in claim 17. Nowhere does the applied art teach or suggest storing the in-line editing tags and context portions of the Web-based document associated with the editing tags in a file including *data identifying a view* as recited in claims 18 and 20, and also the claim 20 steps of receiving a user selection identifying a file including data identifying a view; and redefining the in-line editing tags to include the view prior to the step of reinserting the in-line editing tags. Indeed, neither Matthews nor Ladd alone or in combination suggests a view.

Moreover, the applied art is wholly devoid of a teaching or suggestion that reinserting includes *searching the Web-based document for the context portions* and *inserting the in-line editing tags within corresponding context portions* of the Web-based document as recited in claim 21 or that the context portions of the Web-based document have changed location prior to the step of reinserting as called for in claim 22.

Claim 23 further calls for the context portions including n words before and after each in-line editing tag. To show this feature, the action refers to heading tags as described in Matthews. The relevance of heading tags to the claim 23 feature is unclear. In one illustrative implementation of the claim 23 invention, the number “n” of words is chosen to aid in restoring in-line edits. The applied art does not contemplate such an application.

Furthermore, the applied art lacks a teaching or suggestion of the step of scanning the selected portion of the Web-based document for previously added in-line edit tags, wherein if the previously added in-line edit tag corresponds to the in-line desired editing operation then inserting a group in-line editing tag next to the previously added in-line edit tag as recited in claim 24 and the steps of assigning the in-line editing tags a first custom order attribute; repeating the steps of scanning and inserting for a second set of in-line editing tags; and assigning the second set of in-line editing tags a second custom order attribute higher than the first custom order attribute as recited in claim 25.

In sum, applicants respectfully disagree with the language in which many of the dependent claims are “similarly rejected along the same rationale” as other claims, as no specific teaching or suggestion which establishes a prima facie case of obviousness has been identified to explain how the features of the dependent claims are satisfied by the combination of Matthews and Ladd.

The Examiner is encouraged to contact the undersigned at the number identified below to as necessary to advance prosecution.

Appln. No.: 09/847,606
Amendment dated January 6, 2006
Reply to Office Action of October 25, 2005

CONCLUSION

If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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